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Document Electronically Filed

Hon. Robyn F. Tarnofsky
United States Magistrate Judge
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

Plaintiff's application is GRANTED. Plaintiff's motion is due by **April 17, 2024**. Defendant's response is due by **May 31, 2024**. Plaintiff's reply is due by **June 14, 2024**.

Dated: March 28, 2024

New York, New York

SO ORDERED:

ROBYN F. TARNOFSKY
UNITED STATES MAGISTRATE JUDGE

Re: Bruno v. O'Malley, Commissioner of Social Security
Docket No: 1:23-cv-11293-RFT

Hon. Judge Tarnofsky:

This letter respectfully requests an extension of time of fourteen (14) days for Plaintiff to file Plaintiff's Brief in this matter, to April 17, 2024. Plaintiff's Brief is currently due on April 3, 2024; however, Plaintiff cannot complete the Brief on time for the reasons detailed below.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance, between March 22, and April 1, 2024, staff in Counsel's office have thirty (30) Plaintiff briefs due. This figure does not include briefings which will be due after the filing of Administrative Records throughout this timeframe, Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly prepare the brief by the current deadline. This request will not cause Defendant any undue hardship. This extension is needed to thoroughly and properly prepare the brief.

Plaintiff's counsel has contacted defense counsel who has no objection to this request. This request will not cause Defendant any undue hardship. The parties have agreed on the briefing schedule below. This would be a first request for an extension of time in this matter.

If Plaintiff's request is granted, the new briefing schedule would be:

- **Plaintiff's Brief is due on or before April 17, 2024;**
- **Defendant's Brief is due on or before May 31, 2024; and**
- **Plaintiff's Reply Brief, if any, is due on or before June 14, 2024.**

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Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky
Howard D. Olinsky, Esq.
Counsel for Plaintiff

CC [via ECF]: Jessamyn Hanna, Esq., Attorney for Defendant

SO ORDERED.

Dated: _____

U.S. Magistrate Judge